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Attorneys for Plaintiff,
 KENMARK VENTURES, LLC

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:
 ANTHONY THOMAS and WENDI
 THOMAS,
 AT EMERALD, LLC,
 Debtors.

KENMARK VENTURES, LLC
 Plaintiff,
 v.
 ANTHONY THOMAS and WENDI
 THOMAS,
 Defendants.

Case No. BK-N-14-50333-BTB
 Case No. BK-N-14-50331-BTB

Chapter 7

[Jointly Administered]

Adv. Pro. No. 14-5022

**PLAINTIFF'S FIRST SUPPLEMENT TO
 PRE-TRIAL DISCLOSURES**

[Fed.R.Bankr.Pro. 7026(A)(3)]

Reserving all rights and remedies, KENMARK VENTURES, LLC ("Kenmark") makes the following first supplement to pre-trial disclosures pursuant to Fed.R.Bankr.Pro.7026(a)(3):

III. Additional Trial Exhibits

Kenmark expects to offer the following additional documents to support its claims, either through judicial notice or a sponsoring witness, except for impeachment documents:

1. Request for Judicial Notice

Kenmark will ask the bankruptcy court to take judicial notice of the following:

Documents filed in the Chapter 7 bankruptcy case of Electronic Plastics, LLC, Case No. 09-53721, including but not limited to the bankruptcy schedules and statements, Proofs of Claim and the Claims Register, and pleadings regarding the sale of certain property.

Documents filed in Los Angeles Superior Court Case No. BS118649 styled *Kenneth Conetto by Eric Kitchen v. Kit Morrison and Todd Armstrong*, including but not limited to the Tentative and Proposed Statement of Decision filed on April 8, 2011.

Documents filed in civil action No. 06-5528 in the U.S. District Court for the Northern District of California styled *E-Smart Technologies, Inc. et al. v. Drizin, et al.*, including but not limited to the First Amended Complaint.

Documents filed in civil action No. 11-00895 in the U.S. District Court for the District of Columbia styled *U.S. Securities and Exchange Comm v. E-Smart Technologies, et al.*, including but not limited to the Complaint and Court decisions in various motions for summary judgment.

The Complaint and Answer in the above-captioned Adversary Proceeding No. 14-5022.

Documents filed in the above-captioned bankruptcy cases of ANTHONY THOMAS and WENDI THOMAS, and AT EMERALD, LLC, Case Nos. BK-N-14-50333-BTB and BK-N-14-50331-BTB, respectively, including but not limited to Kenmark's Motion for Relief from Stay.

Documents from the California Secretary of State regarding Electronic Plastics, Inc.

Documents from the Nevada Secretary of State regarding Electronic Plastics, Inc.

Additional documents to be offered:

Discovery requests in the above-captioned Adversary Proceeding No. 14-5022, including but not limited to Kenmark's Request for Production of Documents and Requests for Admission, and Thomas's objections and responses thereto.

Dated: September 22, 2015

/s/ Wayne A. Silver

Wayne A. Silver, attorney for Plaintiff
KENMARK VENTURES, LLC

CERTIFICATE OF SERVICE

I served the foregoing PLAINTIFF'S FIRST SUPPLEMENT TO PRE-TRIAL DISCLOSURES; CERTIFICATE OF SERVICE by the following means on September 22, 2015 to the persons listed below:

XX Regular mail: I caused service of this document to be made on September 22, 2015 by regular, first class United States mail, postage fully pre-paid, addressed to:

Anthony Thomas
Wendi Thomas
7725 Peavine Peak Court
Reno, NV 89523

I declare under penalty of perjury that the foregoing is true and correct. Signed this 22nd day of September, 2015 at Sunnyvale, CA.

/s/ Kevin J. LeBlanc
Kevin J. LeBlanc